

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

PARKER TIRRELL and IRIS TURMELLE,

Plaintiffs.

v.

FRANK EDELBLUT, et al.

Defendants.

Civil Action No. 1:24-cv-00251

**ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE* OF  
ELAINE HERRMANN BLAIS**

Pursuant to Rule 83.2(b) of the Local Civil Rules for the United States District Court for the District of New Hampshire, Plaintiffs Parker Tirrell and Iris Turmelle hereby move this Court to admit Elaine Herrmann Blais of Goodwin Procter LLP to appear, defend, and practice in this case.

In support of this motion, Plaintiffs state as follows:

1. The motion is made by a member of the Bar of this Court, Kevin DeJong, who has appeared as counsel of record in the above-captioned matter.

2. Ms. Blais is an attorney and partner at the law firm of Goodwin Procter LLP, 100 Northern Avenue, Boston, MA 02210.

3. Ms. Blais is a member of the bar in good standing in the State of Massachusetts, the United States District Court for the District of Massachusetts, the United States District Court for the Northern District of California, the United States District Court for the Northern District of Ohio, the United States District Court for the Eastern District of Texas, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Federal Circuit, and the United States Supreme

Court. *See* Declaration of Elaine Herrmann Blais attached hereto as **Exhibit A**.

4. There are no disciplinary proceedings pending against Ms. Blais as a member of the bar of any jurisdiction.

5. Ms. Blais has read and agrees to comply with the Local Rules of the United States District Court for the District of New Hampshire.

6. Counsel for Defendants do not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that Elaine Herrmann Blais be admitted as counsel *pro hac vice* for Parker Tirrell and Iris Turmelle. For the Court's convenience, a proposed order is attached as **Exhibit B**.

Dated: August 22, 2024

Respectfully submitted,

Plaintiffs Parker Tirrell and Iris Turmelle

By their attorney,

/s/ Kevin J. DeJong

Kevin J. DeJong (NH Bar No. 17633)

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**STATEMENTS PURSUANT TO LR 7.1**

Kevin J. DeJong, counsel for Plaintiffs, hereby submits this concurrence statement pursuant to Local Rule 7.1(c) in connection with this Motion for *Pro Hac Vice* Admission, filed on August 22, 2024. Counsel for Plaintiffs has contacted Defendants' counsel, and they have assented to this Motion.

Kevin J. DeJong further states, pursuant to Local Rule 7.1(a)(2), that due to the nature of this Motion, a memorandum in support is not being filed herewith.

/s/ Kevin J. DeJong  
Kevin J. DeJong

**CERTIFICATE OF SERVICE**

I, Kevin J. DeJong, certify that this document filed through the ECF system will be sent electronically to all counsel of record as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 22, 2024.

/s/ Kevin J. DeJong  
Kevin J. DeJong